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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LOUIS FLORES,)	
)	
Plaintiff,)	
)	
v.)	17 Civ. 36 (JGK)
)	
UNITED STATES DEPARTMENT OF)	NOTICE OF MOTION
JUSTICE,)	
)	
Defendant.)	
)	

PLEASE TAKE NOTICE that upon the accompanying Declaration of Tricia Francis, dated January 31, 2018, Declaration of Darian Hodge, dated January 31, 2018, and all exhibits appended to and included thereto; the accompanying memorandum of law; and all prior pleadings and proceedings herein, defendant the United States Department of Justice, by its attorney, Geoffrey S. Berman, United States Attorney for the Southern District of New York, hereby moves this Court, pursuant to Rule 56 of the Federal Rules of Civil Procedure, for an order dismissing the Complaint in its entirety, as well as for such other and further relief as the Court deems just and proper.

Dated: New York, New York
January 31, 2018

Respectfully submitted,

GEOFFREY S. BERMAN
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